REMARKS

Claims 1-9, 11-12, and 20-26 are pending. Claims 1, 2, and 20 are amended. Support for the amendments can be found in the originally filed Specification at paragraphs [00028]-[00031], [00035], and [00036]. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

REJECTION UNDER 35 U.S.C. § 103

Claims 1-2, 7-9, 11, and 20-26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Cheng et al. (U.S. Pub. No. 2001/0032273) in view of Humpleman et al. (U.S. Pat. No. 6,182,094). This rejection is respectfully traversed.

The teachings of Cheng et al. are generally directed toward an architecture of a bridge between a non-IP network and the Web. In particular, the Examiner relies on Cheng et al. to teach use of a Web proxy FCM to bridge between an FTP client on a non-IP network and an FTP server on the Web, with dual connection communication links being employed for both connections between the proxy FCM and the client and server, and mapping of data to GUI objects. However, Cheng et al. do not teach, suggest, or motivate using a non-HTTP proxy messaging structure to map command content and data content between the dual connection communications link and the single connection communications link.

The teachings of Humpleman et al. are generally directed toward generating a program guide for a home network. In particular, the Examiner relies on Humpleman et al. to teach a home network with a bridge proxy interfacing between HTTP/IP interface on a 1394 serial bus and FTP/IP, possibly on an Ethernet medium of the home network.

However, Humpleman et al. do not teach, suggest, or motivate using a non-HTTP proxy messaging structure to map command content and data content between the dual connection communications link and the single connection communications link.

Applicant's claimed invention is generally directed toward transferring files between a residential electronics device and a remote server. In particular, Applicant's claimed invention is directed toward using a non-HTTP proxy messaging structure to map command content and data content between the dual connection communications link and the single connection communications link. For example, independent claim 1, especially as amended, recites, "using a non-HTTP proxy messaging structure to map command content and data content between the dual connection communications link and the single connection communications link by at least one of: (a) multiplexing FTP commands/replies and FTP data content into one message, thereby transferring the FTP commands/replies and the FTP data content between the FTP client and the proxy FCM in shared messages; or (b) mapping FTP messages into dedicated control messages containing control content for the FTP message, and dedicated data messages containing data contents for the FTP messages, thereby transferring the FTP commands/replies and the FTP data content between the FTP client and the proxy FCM in separate messages." Claim 20, especially as amended, recites similar subject matter. Therefore, Cheng et al. and Humpleman et al. do not teach, suggest, or motivate all of the limitations of the independent claims. These differences are significant because the non-HTTP proxy messaging structure allows the single connection communications link to be used even for non-HTTP/IP devices on the home network.

Accordingly, Applicant's respectfully request that the Examiner reconsider and withdraw the rejection of independent claims 1 and 20 under 35 U.S.C. § 103(a), along with rejection on these grounds of all claims dependent therefrom.

Claims 3-6 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Cheng et al. (U.S. Pub. No. 2001/0032273) in view of Humpleman et al. (U.S. Pat. No. 6,182,094) and Daniels-Barnes et al. (U.S. Pat. No. 6,571,277). This rejection is respectfully traversed.

For the differences between Applicant's claimed invention and the teachings of Cheng et al. and Humpleman et al., Applicant respectfully directs the Examiner's attention to remarks detailed above with respect to rejection of claim 1 and 20.

The teachings of Daniels-Barnes et al. are generally directed toward scaling universal plug and play networks using atomic proxy replication. In particular, the Examiner relies on Daniels-Barnes et al. to teach atomic proxy replication wherein the proxies work like a registry of services with multiple access methods such as HTTP and FTP, and identifies a "shared message" in the form of a shared cache, with an alternate location header of an ssdp:alive message identifying a proxy's universal resource identifier. However, Daniels-Barnes et al. do not teach, suggest, or motivate using a non-HTTP proxy messaging structure to map command content and data content between a dual connection communications link and a single connection communications link.

Applicant's claimed invention is generally directed toward transferring files between a residential electronics device and a remote server. In particular, Applicant's claimed invention is directed toward using a non-HTTP proxy messaging structure to

map command content and data content between the dual connection communications link and the single connection communications link. For example, independent claim 1, especially as amended, recites, "using a non-HTTP proxy messaging structure to map command content and data content between the dual connection communications link and the single connection communications link by at least one of: (a) multiplexing FTP commands/replies and FTP data content into one message, thereby transferring the FTP commands/replies and the FTP data content between the FTP client and the proxy FCM in shared messages; or (b) mapping FTP messages into dedicated control messages containing control content for the FTP message, and dedicated data messages containing data contents for the FTP messages, thereby transferring the FTP commands/replies and the FTP data content between the FTP client and the proxy FCM in separate messages." Therefore, Cheng et al., Humpleman et al., and Daniels-Barnes et al. do not teach, suggest, or motivate all of the limitations of the independent claims. These differences are significant because the non-HTTP proxy messaging structure allows the single connection communications link to be used even for non-HTTP/IP devices on the home network.

Accordingly, Applicant's respectfully request that the Examiner reconsider and withdraw the rejection of dependent claims 3-6 under 35 U.S.C. § 103(a) in view of their dependence from allowable base claim 1.

CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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By: _____
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